

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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	::	ECF Case
In re:	::	
	::	09 Civ. 4743 (LAP)
Chrysler LLC, <i>et al.</i> ,	::	
	::	<b>DECLARATION</b>
Debtors.	::	<b>OF LI YU</b>
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LI YU, pursuant to 28 U.S.C. § 1746, declares the following under penalty of perjury:

1. I am an Assistant United States Attorney in the office of Lev L. Dassin, Acting United States Attorney for the Southern District of New York, attorney for the United States Department of Treasury (the “Treasury Department”), in the above-captioned action. I make this declaration in support of Treasury Department’s opposition to a motion for a stay of certain bankruptcy proceedings filed by Indiana State Teachers Retirement Fund, Indiana State Police Pension Trust, and Indiana Major Moves Construction Trust (collectively, the “Objectors”).

2. Attached hereto as Exhibit A is true and correct copy of an Order Denying Emergency Motion of Indiana Pensioners for Stay of Proceedings Pending Determination of Motion to Withdraw the Reference, dated May 20, 2009, issued by United States Bankruptcy Judge Arthur J. Gonzalez in *In re Chrysler, LLC, et al.*, No. 09-50002(AJG) (the “Chrysler Bankruptcy”).

3. Attached hereto as Exhibit B is true and correct copy of an Affidavit of Ronald E. Kolka dated April 30, 2009, without the attached exhibits, filed in the Chrysler Bankruptcy.

4. Attached hereto as Exhibit C is true and correct copy of a Determination of the Secretary of the Treasury Henry M. Paulson, dated December 19, 2008.

5. Attached hereto as Exhibit D is true and correct copy of a Determination of the Secretary of the Treasury Timothy F. Geithner, dated April 29, 2009.

6. Attached hereto as Exhibit E is true and correct copy of an Objection to the Sale Motion filed by the Objectors in the Chrysler Bankruptcy on May 19, 2009.

7. Attached hereto as Exhibit F is a true and correct copy of excerpts from the Objection of Chrysler Non-TARP Lenders to the Motion of Debtors and Debtors In Possession for Interim and Final Orders (A) Authorizing Them to Obtain Postpetition Financing; and (B) Granting Adequate Protection to Certain Prepetition Secured Parties dated May 4, 2009.

8. Attached hereto as Exhibit G is a true and correct copy of excerpts from the Objection to Motion /Preliminary Objection of The Chrysler Non-TARP Lenders to Motion of Debtors and Debtors in Possession, Pursuant to Sections 105, 363 and 365 of the Bankruptcy Code and Bankruptcy Rules 2002, 6004 and 6006, for (I) An Order (A) Approving Bidding Procedures and Bidder Protections for the Sale of Substantially All of the Debtors' Assets and (B) Scheduling a Final Sale Hearing and Approving the Form and Manner of Notice Thereof; and (II) an Order (A) Authorizing the Sale of Substantially All of the Debtors' Assets, Free and Clear of Liens, Claims, Interests and Encumbrances, (B) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection Therewith and Related Procedures and (C) Granting Certain Related Relief, dated May 4, 2009.

9. Attached hereto as Exhibit H is a true and correct copy of excerpts from the transcript of a court hearing on May 20, 2009 in the Chrysler Bankruptcy.

10. Attached hereto as Exhibit I is a true and correct copy of Interim Order Pursuant To Bankruptcy Code Sections 105(a), 361, 362, 363, 364 And 507 And Bankruptcy Rules 2002, 4001 And 6004 (A) Approving A Dip Credit Facility And Authorizing The Debtors To Obtain Post-Petition Financing Pursuant Thereto, (B) Granting Related Liens And Super-Priority Status,

(C) Granting Adequate Protection To Certain Pre-Petition Secured Parties, And (D) Scheduling A Final Hearing,

11. Attached hereto as Exhibit J is a true and correct copy of an Order Pursuant To Sections 105, 363 And 365 Of The Bankruptcy Code And Bankruptcy Rules 2002, 6004 And 6006, (A) Approving Bidding Procedures For The Sale Of Substantially All Of The Debtors' Assets, (B) Authorizing The Debtors To Provide Certain Bid Protections, (C) Scheduling A Final Hearing Approving The Sale Of Substantially All Of The Debtors' Assets And (D) Approving The Form And Manner Of Notice Thereof, dated May 7, 2009.

12. Attached hereto as Exhibit K is a true and correct copy of a Final Order Pursuant To Bankruptcy Code Sections 105(A), 361, 362, 363, 364 And 507 And Bankruptcy Rules 2002, 4001 And 6004 (A) Approving A Dip Credit Facility And Authorizing The Debtors To Obtain Post-Petition Financing Pursuant Thereto, (B) Granting Related Liens And Super-Priority Status, And (C) Granting Adequate Protection To Certain Pre-Petition Secured Parties dated May 20, 2009.

13. Attached hereto as Ex L is a true and correct copy of Order Denying Emergency Motion Of The Indiana Investors For Stay Of Proceedings Pending Determination Of Motion To Withdraw The Reference dated May 20, 2009.

Dated: New York, New York  
May 22, 2009

s/ Li Yu  
LI YU  
Assistant United States Attorney